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UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**LAURA VARTAIN HORN DECLARATION  
IN SUPPORT OF DEFENDANTS UBER  
TECHNOLOGIES, INC., RASIER LLC AND  
RASIER-CA, LLC'S UNOPPOSED  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF THE MAY 22, 2025  
HEARING TRANSCRIPT**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

I, Laura Vartain Horn, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice in the State of California, and a partner with the law firm of Kirkland & Ellis LLP, 555 California Street, San Francisco, CA 94104. I am counsel for Defendants Uber Technologies Inc., Rasier LLC and Rasier-CA, LLC (collectively, “Uber”). I have personal knowledge of the matters set forth below and if called and sworn as a witness, I could and would testify competently to the facts set forth herein.
2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in Support of Uber’s Unopposed Administrative Motion to Seal Portions of May 22, 2025 Hearing Transcript (the “Hearing Transcript”), attached hereto as Exhibit A.
3. The Hearing Transcript contains the past physical whereabouts of a current Uber executive, the disclosure of which implicates security and safety concerns. In making this request, Uber has considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.
4. I have reviewed the document that Uber seeks to file under seal pursuant to Civil Local Rule 79-5. Based on my review, there is good cause to seal the following information:

Document	Text to be Sealed	Party Claiming Confidentiality
May 22, 2025 Hearing Transcript	Portions highlighted at pages: 14:22-14:23	Uber Technologies Inc.; Rasier LLC; Rasier-CA, LLC

5. Uber does not seek to redact or file under seal any of the remaining portions of the May 22, 2025 Hearing Transcript not indicated in the table above.

6. I conferred with Plaintiffs regarding the Motion on June 12, 2025, and they do not oppose the Motion.

7. For the reasons discussed in the Motion, Uber respectfully requests that the Court order the identified portions of the Hearing Transcript to be sealed.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed in San Francisco, CA on June 12, 2025.

Dated: June 12, 2025

Respectfully submitted,

By: /s/ Laura Vartain Horn  
LAURA VARTAIN HORN

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